EXECUTIVE SUMMARY

Thank you for your continued hard work sampling **Little Lake Sunapee, New London** this year!

We congratulate your group for sampling your lake **once** this summer. However, we strongly encourage your monitoring group to sample **additional** times each summer. Typically, we recommend that monitoring groups sample **three times** per summer (once in **June**, **July**, and **August**). We understand that the number of sampling events you decide to conduct per summer will depend upon volunteer availability, and your monitoring group's goals and funding availability. However, with a limited amount of data it is difficult to determine accurate and representative water quality trends. Since weather patterns and activity in the watershed can change throughout the summer, from year to year, and even from hour to hour during a rain event, it is a good idea to sample the lake at least once per month during the summer.

If you are having difficulty finding volunteers to help sample or to travel to one of the laboratories, please call the VLAP Coordinator and DES will help you work out an arrangement.

If your monitoring group's sampling events this year were limited due to not having enough time to pick-up or drop-off samples at the Limnology Center in Concord, please remember the Colby Sawyer College Water Quality Laboratory is open in New London. This laboratory was established to serve the large number of lakes/ponds in the greater Lake Sunapee region of the state. This laboratory is inspected by DES and operates under a DES approved quality assurance plan. We encourage your monitoring group to utilize this laboratory next summer for all sampling events, except for the annual DES biologist visit. To find out more about the Colby Sawyer College Water Quality Laboratory, and/or to schedule dates to pick up bottles and equipment, please call Bonnie Lewis, laboratory manager, at (603) 526-3486.

As part of the Environmental Protection Agency's (EPA) National Lake Assessment (NLA) initiative and the Probalistic Lake Assessment (PLA), DES biologists performed a comprehensive lake assessment on **Little Lake Sunapee** in **July** during **2008**. The NLA and PLA serves to assess the Nation's lake and determine the percentage of our Nation's lakes that are in good, fair or poor condition. Lakes were randomly selected based on a statistical survey representing the population of lakes in their ecological region, but had to be at least one meter deep and over ten acres in size. Lakes were assessed using standard protocols, and the following parameters were measured: temperature, dissolved oxygen, nutrients, chlorophyll-a, water clarity, turbidity, color, zooplankton and phytoplankton, bacteria, macroinvertbrates, habitat condition, and sediment cores. Some data from this assessment has been included in your annual report and added to the historical database for your lake. The lake's data will help to determine the regional and national condition of lakes. Those volunteer monitoring groups with historical data can compare the condition of their lakes on a statewide, regional or national level. Data from the National Lake Assessment will be compiled, entered into a national database, analyzed, and a draft report will be made available for public review. For more information about EPA's NLA please visit www.epa.gov/owow/lakes/lakessurvey.

OBSERVATIONS & RECOMMENDATIONS

DEEP SPOT

➢ Chlorophyll-a

Chlorophyll-a, a pigment found in plants, is an indicator of algal or cyanobacteria abundance. Algae are typically microscopic plants that are naturally found in the lake ecosystem. The measurement of chlorophyll-a in the water gives biologists an estimation of the algal concentration or lake productivity. Table 14 in Appendix A lists the current year chlorophyll-a data.

Figure 1 depicts the historical and current year chlorophyll-a concentration in the water column.

The median summer chlorophyll-a concentration for New Hampshire's lakes and ponds is 4.58 mg/m^3.

The current year data (the top graph) show that the chlorophyll-a concentration was **3.12 mg/m^3** in **July**.

Please note that the chlorophyll-a concentrations for the 7/28/2008 and 7/29/2008 sampling events were averaged.

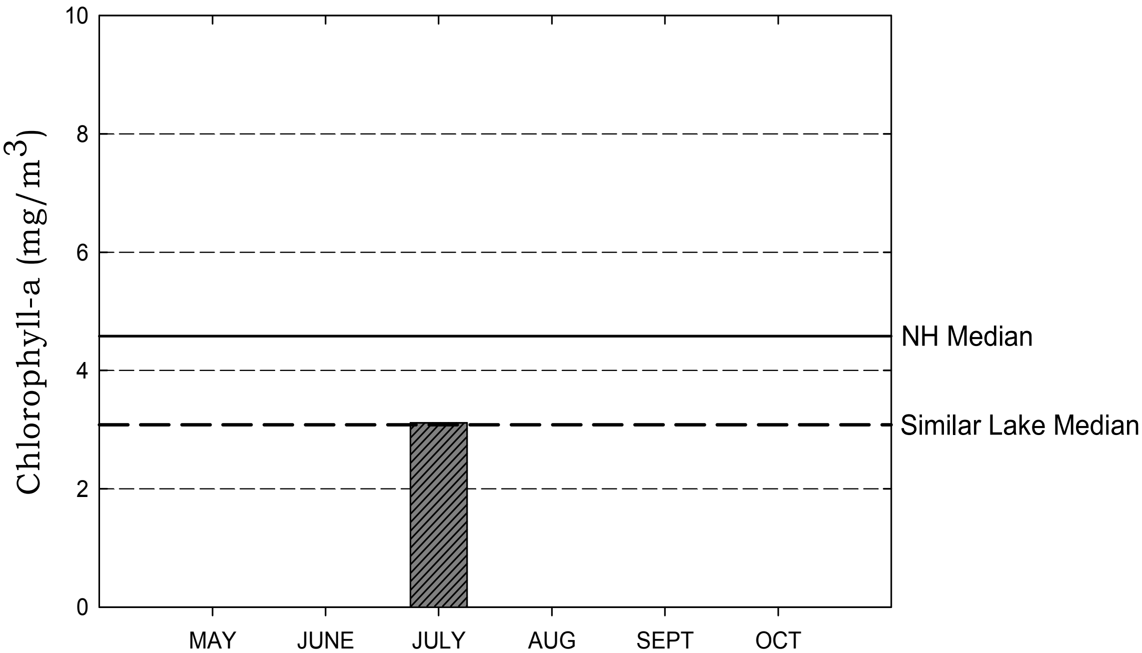
The historical data (the bottom graph) show that the **2008** chlorophyll-a mean is ***slightly less than*** the state median and is ***approximately equal to*** the similar lake median. For more information on the similar lake median, refer to Appendix D.

Overall, visual inspection of the historical data trend line (the bottom graph) shows an ***increasing*** in-lake chlorophyll-a trend since monitoring began. Specifically the mean chlorophyll concentration has ***worsened*** since **1996**

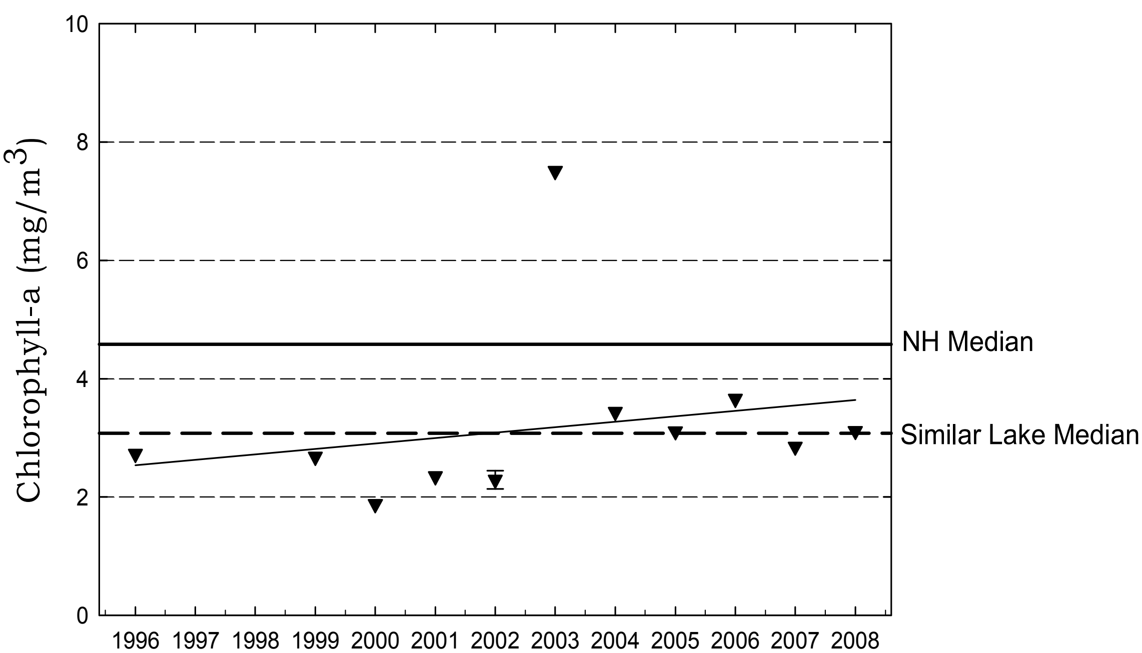
While algae are naturally present in all waterbodies, an excessive or increasing amount of any type is not welcomed. Phosphorus is the nutrient that algae typically depend upon for growth in New Hampshire lakes and ponds. Algal concentrations increase as nonpoint sources of phosphorus from the watershed increase, or as in-lake phosphorus sources increase. Increased Chlorophyll-a concentrations can also affect water clarity, causing Secchi-disk transparency to decrease (worsen) and turbidity to increase (worsen).
Therefore, it is extremely important for volunteer monitors to continually educate all watershed residents about management practices that can be implemented to minimize phosphorus loading to surface waters.

Little Lake Sunapee, New London

Figure 1. Monthly and Historical Chlorophyll-a Results



2008 Chlorophyll-a Results



Historical Chlorophyll-a Results

➢ Phytoplankton and Cyanobacteria

Table 1 lists the phytoplankton (algae) and/or cyanobacteria observed in the pond in **2008**. Specifically, this table lists the three most dominant phytoplankton and/or cyanobacteria observed and their relative dominance in the sample.

Table 1. Dominant Phytoplankton/Cyanobacteria (July 2008)

Division	Genus	% Dominance
Bacillariophyta	Asterionella	61.7
Chrysophyta	Chrysosphaerella	18.6
Chrysophyta	Dinobryon	10.8

Phytoplankton populations undergo a natural succession during the growing season. Please refer to the "Biological Monitoring Parameters" section of this report for a more detailed explanation regarding seasonal plankton succession. Diatoms and golden-brown algae populations are typical in New Hampshire's less productive lakes and ponds.

➢ Secchi Disk Transparency

Volunteer monitors use the Secchi disk, a 20 cm disk with alternating black and white quadrants, to measure how far a person can see into the water. Transparency, a measure of water clarity, can be affected by the amount of algae and sediment in the water, as well as the natural color of the water. Table 14 in Appendix A lists the current year transparency data. **The median summer transparency for New Hampshire's lakes and ponds is 3.2 meters.**

Figure 2 depicts the historical and current year transparency ***with and without*** the use of a viewscope.

The current year data (the top graph) includes both the non-viewscope and viewscope readings for **2008**.

The current year ***non-viewscope*** in-lake transparency was **5.55 meters** in **July**.

Please note that the transparency values from 7/28/2008 and 7/29/2008 were averaged.

The current year ***viewscope*** in-lake transparency was **6.5 meters** in **July**.

The transparency measured with the viewscope was ***greater than*** the transparency measured without the viewscope this summer. As discussed previously, a comparison of the transparency readings taken with and without the use of a viewscope shows that the viewscope typically increases the depth to which the Secchi disk can be seen into the lake, particularly on sunny and windy days. We recommend that your group measure Secchi disk transparency with and without the viewscope on each sampling event.

It is important to note that viewscope transparency data are not compared to a New Hampshire median or similar lake median. This is because lake transparency with the use of a viewscope has not been historically measured by DES. In the future, the New Hampshire and similar lake medians for viewscope transparency will be calculated and added to the appropriate graphs.

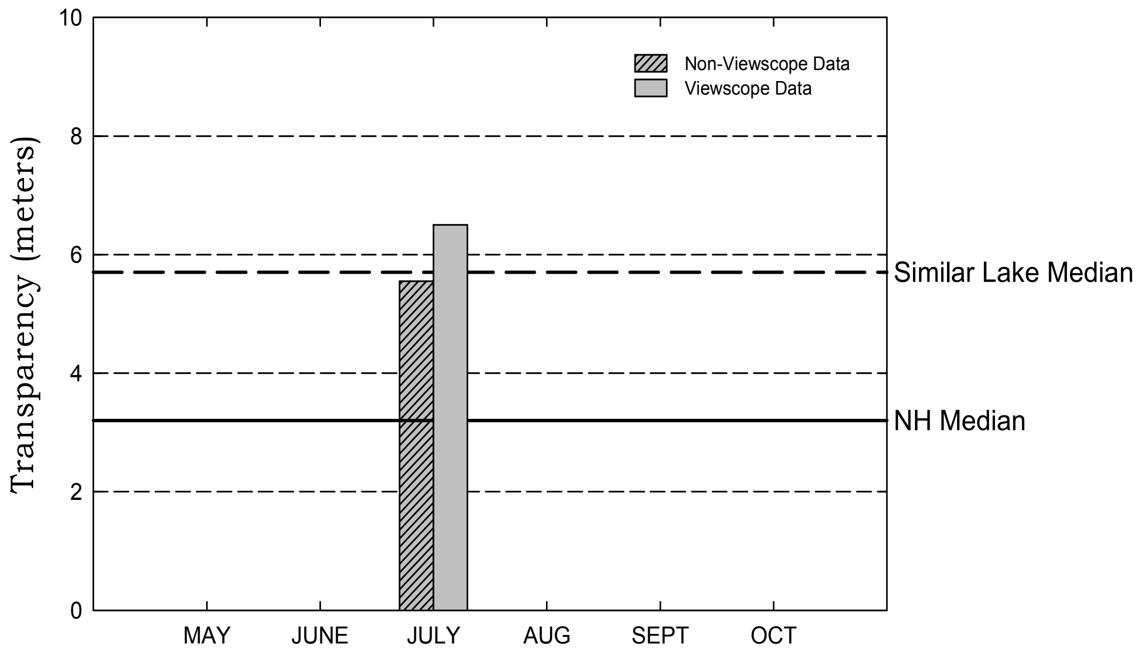
The historical data (the bottom graph) show that the **2008** mean non-viewscope transparency is ***greater than*** the state median and is ***slightly less than*** the similar lake median. Please refer to Appendix D for more information about the similar lake median.

Visual inspection of the historical data trend line (the bottom graph) shows a ***relatively stable*** trend. Specifically, the transparency has ***remained relatively stable ranging between 3.50 and 5.70 meters*** since monitoring began in **1996**.

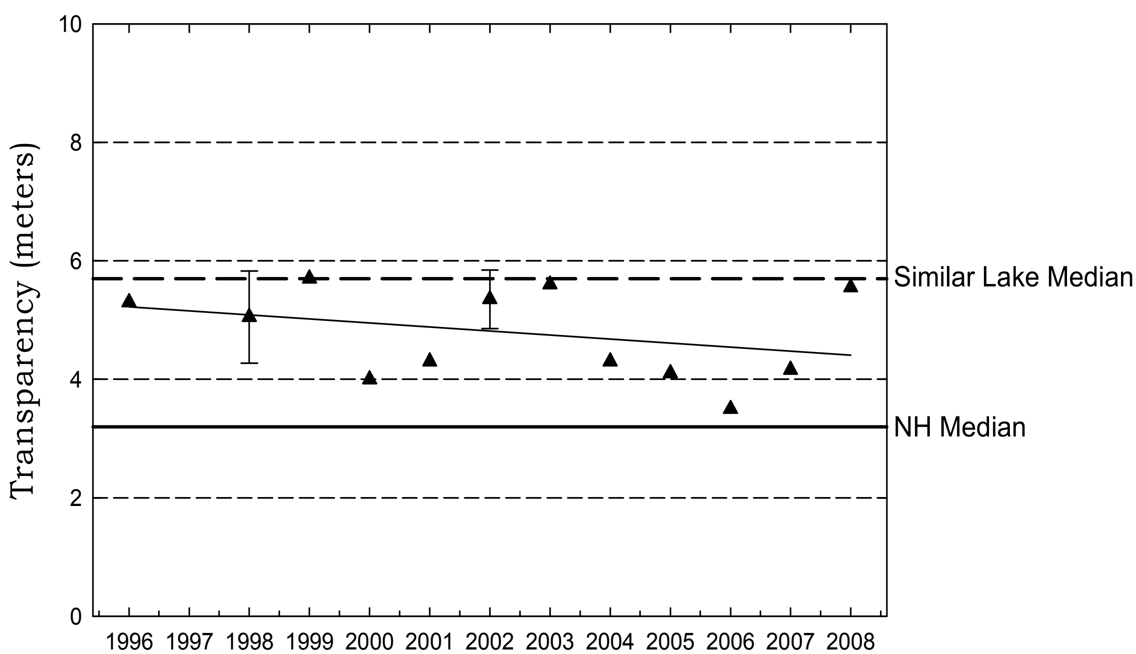
Typically, high intensity rainfall causes sediment-laden stormwater runoff to flow into surface waters, thus increasing turbidity and decreasing clarity. Efforts should continually be made to stabilize stream banks, pond shorelines, disturbed soils within the watershed, and especially dirt roads located immediately adjacent to the edge of tributaries and the pond. Guides to best management practices that can be implemented to reduce, and possibly even eliminate, nonpoint source pollutants, are available from DES upon request.

Little Lake Sunapee, New London

Figure 2. Monthly and Historical Transparency Results



2008 Transparency Viewscope and Non-Viewscope Results



Historical Transparency Non-Viewscope Results

➢ Total Phosphorus

Phosphorus is typically the limiting nutrient for vascular plant and algae growth in New Hampshire's lakes and ponds. Excessive phosphorus in a pond can lead to increased plant and algal growth over time. Table 14 in Appendix A lists the current year total phosphorus data for in-lake and tributary stations. **The median summer total phosphorus concentration in the epilimnion (upper layer) of New Hampshire's lakes and ponds is 12 ug/L. The median summer phosphorus concentration in the hypolimnion (lower layer) is 14 ug/L.**

The graphs in Figure 3 depict the historical amount of epilimnetic (upper layer) and hypolimnetic (lower layer) total phosphorus concentrations; the inset graphs depict current year total phosphorus data.

The current year data for the epilimnion (the top inset graph) show that the phosphorus concentration was ***non-detectable*** in **July**. Please note that non-detectable represents < 5 ug/L.

The historical data show that the **2008** mean epilimnetic phosphorus concentration is ***much less than*** the state and similar lake medians. Refer to Appendix D for more information about the similar lake median.

The current year data for the hypolimnion (the bottom inset graph) show that the phosphorus concentration was **6.7 ug/L** in **July**.

Please note that the phosphorus concentrations from 7/28/2008 and 7/29/2008 were averaged.

The historical data show that the **2008** mean hypolimnetic phosphorus concentration is ***much less than*** the state and similar lake medians. Please refer to Appendix D for more information about the similar lake median.

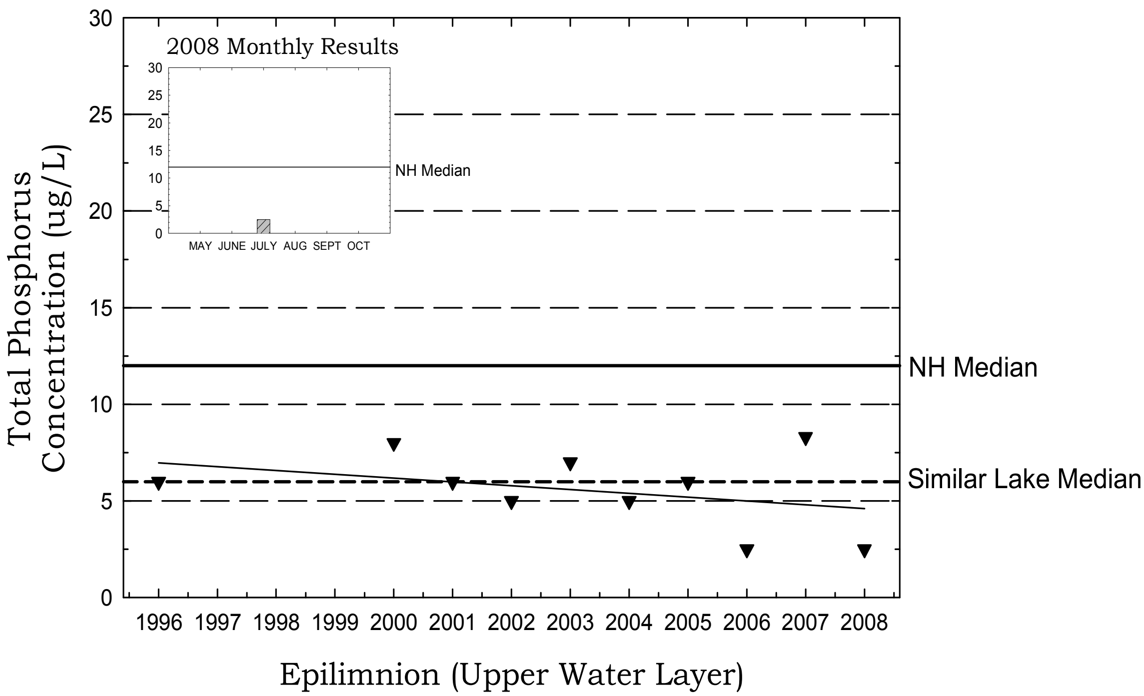
Overall, visual inspection of the historical data trend line for the epilimnion shows a ***relatively stable*** phosphorus trend. Specifically, the mean annual epilimnetic phosphorus concentration has ***remained approximately the same*** since monitoring began in **1996**.

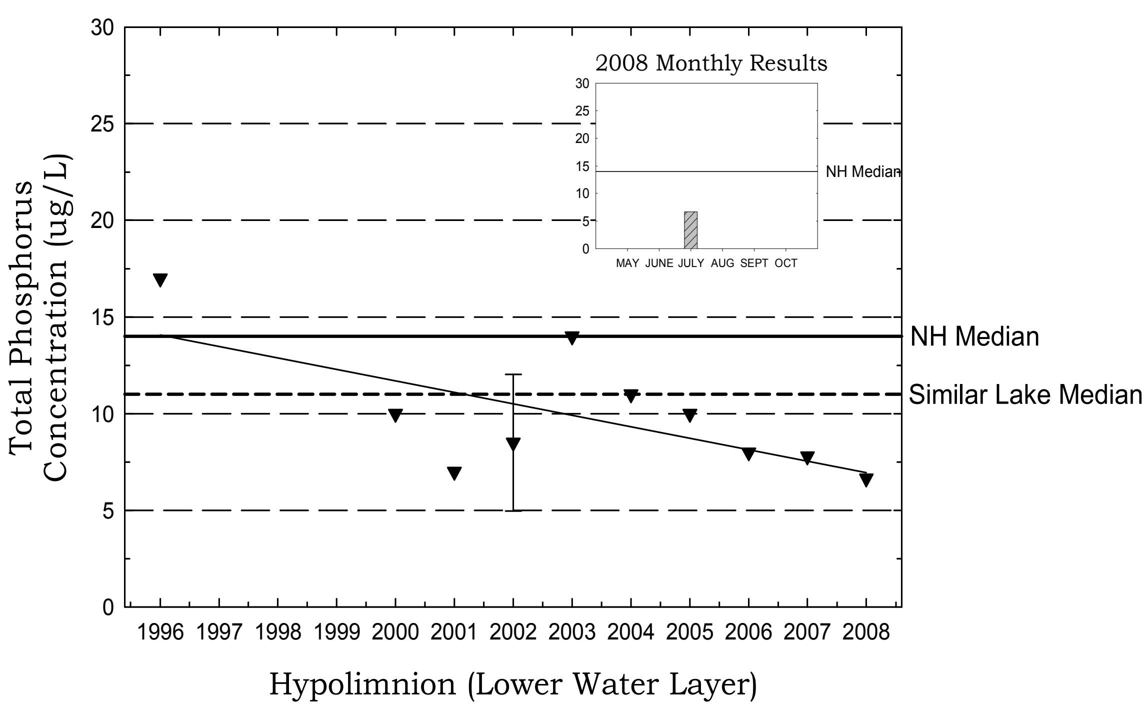
Overall, visual inspection of the historical data trend line for the hypolimnion shows a ***decreasing*** phosphorus trend since monitoring began. Specifically the mean annual concentration has ***improved*** since monitoring began in **1996**.

One of the most important approaches to reducing phosphorus loading to a waterbody is to continually educate watershed residents about the watershed sources of phosphorus and how excessive phosphorus loading can negatively affect the ecology and the recreational, economical, and ecological value of lakes and ponds.

Little Lake Sunapee, New London

Figure 3. Monthly and Historical Total Phosphorus Data





➢ pH

Table 14 in Appendix A presents the current year pH data for the in-lake stations.

pH is measured on a logarithmic scale of 0 (acidic) to 14 (basic). pH is important to the survival and reproduction of fish and other aquatic life. A pH below 6.0 typically limits the growth and reproduction of fish. A pH between 6.0 and 7.0 is ideal for fish. The median pH value for the epilimnion (upper layer) in New Hampshire's lakes and ponds is **6.6**, which indicates that the state surface waters are slightly acidic. For a more detailed explanation regarding pH, please refer to the "Chemical Monitoring Parameters" section of this report.

The pH at the deep spot this year ranged from **6.37 to 6.76** in the epilimnion and from **5.79 to 5.91** in the hypolimnion, which means that the water is ***slightly acidic***.

It is important to point out that the hypolimnetic (lower layer) pH was ***lower (more acidic)*** than in the epilimnion (upper layer). This increase in acidity near the bottom is likely due to the decomposition of organic matter and the release of acidic by-products into the water column.

Due to the state's abundance of granite bedrock and acid deposition received from snowmelt, rainfall, and atmospheric particulates, there is little that can be feasibly done to effectively increase pond pH. The pH at the deep spot, however, is sufficient to support aquatic life.

➢ Acid Neutralizing Capacity (ANC)

Table 14 in Appendix A presents the current year epilimnetic ANC for the deep spot.

Buffering capacity (ANC) describes the ability of a solution to resist changes in pH by neutralizing the acidic input. The median ANC value for New Hampshire's lakes and ponds is **4.9 mg/L**, which indicates that many lakes and ponds in the state are at least "moderately vulnerable" to acidic inputs. For a more detailed explanation about ANC, please refer to the "Chemical Monitoring Parameters" section of this report.

The acid neutralizing capacity (ANC) of the epilimnion (upper layer) ranged from **3.0 mg/L to 3.8 mg/L**. This indicates that the lake is ***moderately vulnerable*** to acidic inputs.

➢ Conductivity

Table 14 in Appendix A presents the current conductivity data for in-lake stations.

Conductivity is the numerical expression of the ability of water to carry an electric current, which is determined by the number of negatively charged ions from metals, salts, and minerals in the water column. The median conductivity value for New Hampshire's lakes and ponds is **40.0 uMhos/cm**. For a more detailed explanation, please refer to the "Chemical Monitoring Parameters" section of this report.

The in-lake conductivity is ***greater than*** the state median. Typically, increasing conductivity indicates the influence of pollutant sources associated with human activities. These sources include failed or marginally functioning septic systems, agricultural runoff, and road runoff which contains road salt during the spring snow-melt. New development in the watershed can alter runoff patterns and expose new soil and bedrock areas, which could also contribute to increasing conductivity. In addition, natural sources, such as iron and manganese deposits in bedrock, can influence conductivity.

We recommend that your monitoring group conduct a shoreline conductivity survey of the lake and tributaries with ***elevated*** conductivity to help identify the sources of conductivity.

To learn how to conduct a shoreline or tributary conductivity survey, please refer to the 2004 special topic article, which is posted on the VLAP website at ***http://www.des.nh.gov/organization/divisions/water/wmb/vlap/categories/publications.htm****, or contact the VLAP Coordinator.*

It is possible that de-icing materials applied to nearby roadways during the winter months may be influencing the conductivity in the lake. In New Hampshire, the most commonly used de-icing material is salt (sodium chloride).

A limited amount of chloride sampling was conducted during ***2008****. Please refer to the chloride discussion for more information.*

Therefore, we recommend that the **epilimnion** (upper layer) be sampled for chloride next year. This additional sampling may help us identify what areas of the watershed are contributing to the increasing in-lake conductivity.

Please note that the DES Limnology Center in Concord is able to conduct chloride analyses, free of charge. As a reminder, it is best to conduct chloride sampling in the spring as the snow is melting and during rain events.

- **Total Kjeldahl Nitrogen and Nitrite+Nitrate Nitrogen (only those lakes with current year Lake Survey data)**

Table 7a in Appendix A presents the current year and historical Total Kjeldahl Nitrogen and Table 7b presents the current year and historical nitrite and nitrate nitrogen. Nitrogen is another nutrient that is essential for the growth of plants and algae. Nitrogen is typically the limiting nutrient in estuaries and coastal ecosystems. However, in freshwater, nitrogen is not typically the limiting nutrient. Therefore, nitrogen is not typically sampled through VLAP. However, if phosphorus concentrations in freshwater are elevated, then nitrogen loading may stimulate additional plant and algal growth. Please refer to the "Chemical Monitoring Parameters" section of this report for a more detailed explanation.

The ratio of the mean total nitrogen to mean total phosphorus (TN:TP) in the epilimnion sample this year was **60**, which is **greater than 15** and indicates that **phosphorus** is the **limiting nutrient** in the lake. This means that any additional **phosphorus** loading to the pond will stimulate additional plant and algal growth. Therefore, it is not critical to conduct nitrogen sampling.

➢ Dissolved Oxygen and Temperature

Table 9 in Appendix A depicts the dissolved oxygen/temperature profile(s) collected during **2008**.

The presence of sufficient amounts of dissolved oxygen in the water column is vital to fish and amphibians and also to bottom-dwelling organisms. Please refer to the "Chemical Monitoring Parameters" section of this report for a more detailed explanation.

The dissolved oxygen concentration was ***lower in the hypolimnion (lower layer) than in the epilimnion (upper layer)*** at the deep spot on the **7/29/2008** sampling event. As stratified lakes age, and as the summer progresses, oxygen typically becomes ***depleted*** in the hypolimnion by the process of decomposition. Specifically, the reduction of hypolimnetic oxygen is primarily a result of biological organisms using oxygen to break down organic matter, both in the water column and particularly at the bottom of the lake where the water meets the sediment. When the hypolimnetic oxygen concentration is depleted to less than 1 mg/L, the phosphorus that is normally bound up in the sediment may be re-released into the water column, a process referred to as ***internal phosphorus loading***.

The ***lower*** hypolimnetic oxygen level is a sign of the lake's ***aging*** health. This year the DES biologist collected the dissolved oxygen profile in **July**. We recommend that the annual biologist visit for the **2009** sampling year be scheduled during **June** so that we can determine if oxygen is depleted in the hypolimnion ***earlier*** in the sampling year.

➢ Turbidity

Table 14 in Appendix A presents the current year data for in-lake turbidity.

Turbidity in the water is caused by suspended matter, such as clay, silt, and algae. Water clarity is strongly influenced by turbidity. Please refer to the

"Other Monitoring Parameters" section of this report for a more detailed explanation.

The deep spot turbidity was ***relatively low*** this year, which is good news.

However, we recommend that your group sample the pond and any surface water runoff areas during significant rain events to determine if stormwater runoff contributes turbidity and phosphorus to the lake.

For a detailed explanation on how to conduct rain event sampling, please refer to the 2002 VLAP Annual Report special topic article, which is posted on the VLAP website at ***http://www.des.nh.gov/organization/divisions/water/wmb/vlap/categories/publications.htm****, or contact the VLAP Coordinator.*

TRIBUTARY SAMPLING

➢ Total Phosphorus

Table 14 in Appendix A presents the current year total phosphorus data for tributary stations. Please refer to the "Chemical Monitoring Parameters" section of the report for a detailed explanation of total phosphorus.

Overall, tributary phosphorus concentration(s) were **very low** in **2008** indicating that potentially damaging land use activities as a result of human disturbances in the watershed did not affect the lake this year. This is great news considering the elevated stormwater runoff received this summer.

➢ pH

Table 14 in Appendix A presents the current year pH data for the tributary stations. Please refer to the "Chemical Monitoring Parameters" section of this report for a more detailed explanation of pH.

The pH of the tributary stations ranged from **6.36 to 6.68 (> 6)** and is sufficient to support aquatic life.

➢ Conductivity

Table 14 in Appendix A presents the current conductivity data for the tributary stations. Please refer to the "Chemical Monitoring Parameters" section of the report for a more detailed explanation of conductivity.

The tributaries have experienced elevated conductivity levels since monitoring began. We recommend that your monitoring group conduct a conductivity survey of tributaries with ***elevated*** conductivity and along the shoreline of the pond to help identify the sources of conductivity. As previously mentioned increasing conductivity typically indicates the influence of pollutant sources associated with human activities.

We recommend that your monitoring group conduct stream surveys and rain event sampling along the tributaries with ***elevated*** conductivity so that we can determine potential sources to the lake.

For a detailed explanation on how to conduct rain event sampling and stream surveys, please refer to the 2002 VLAP Annual Report special topic article, which is posted on the VLAP website at ***http://www.des.nh.gov/organization/divisions/water/wmb/vlap/categories/publications.htm****, or contact the VLAP Coordinator.*

To learn how to conduct a shoreline or tributary conductivity survey, please refer *to the 2004 special topic article, which is posted on the VLAP website at* ***http://www.des.nh.gov/organization/divisions/water/wmb/vlap/categories/publications.htm****, or contact the VLAP Coordinator.*

➢ Turbidity

Table 14 in Appendix A presents the current year turbidity data for the tributary stations. Please refer to the "Other Monitoring Parameters" section of the report for a more detailed explanation of turbidity.

Overall, **2008** tributary turbidity levels were ***similar*** to historical tributary turbidity levels.

➢ Bacteria (*E. coli*)

Table 14 in Appendix A lists the current year data for bacteria *(E.coli*) testing. *E. coli* is a normal bacterium found in the large intestine of humans and other warm-blooded animals. *E.coli* is used as an indicator organism because it is easily cultured and its presence in the water, in defined amounts, indicates that sewage **may** be present. If sewage is present in the water, potentially harmful disease-causing organisms **may** also be present. Please refer to the "Other Monitoring Parameters" section of the report for a more detailed explanation.

Two in-lake locations were sampled for *E.coli* on the **7/28/2008** DES Lake Survey Program sampling event. The results were **10 cts/100 mL**, which is ***much less than*** the state standard of 406 counts per 100 mL for recreational surface waters that are not designated public beaches and 88 counts per 100 mL for surface waters that are designated public beaches.

If residents are concerned about sources of bacteria, such as failing septic systems, animal waste, or waterfowl waste, it is best to conduct *E. coli* testing when the water table is high, when beach use is heavy, or immediately after rain events.

The *E. coli* concentration was **very low** at each station sampled on the **7/29/2008** sampling event. Specifically, each result was **10 counts or less**, which is ***much less than*** the state standard of 406 counts per 100 mL for recreational surface waters that are not designated public beaches and 88 counts per 100 mL for surface waters that are designated public beaches.

➢ Chlorides

Table 14 in Appendix A lists the current year data for chloride sampling. The chloride ion (Cl^-) is found naturally in some surface waters and groundwaters and in high concentrations in seawater. Research has shown that elevated chloride levels can be toxic to freshwater aquatic life. In order to protect freshwater aquatic life in New Hampshire, the state has adopted **acute and chronic** chloride criteria of **860 and 230 mg/L** respectively. The chloride content in New Hampshire lakes is naturally low, generally less than 2 mg/L in surface waters located in remote areas away from habitation. Higher values are generally associated with salted highways and, to a lesser extent, with septic inputs. Please refer to the "Chemical Monitoring Parameters" section of this report for a more detailed explanation.

The **epilimnion** and **hypolimnion** were sampled for chloride during the **7/28/2008** sampling event. The results were **16** and **15 mg/L**, which is ***much less than*** the state acute and chronic chloride criteria. However, this concentration is ***greater than*** what we would normally expect to measure in undisturbed New Hampshire surface waters.

Station A, Station H and Station O were sampled for chloride on the **7/29/2008** sampling events. The results were **19, 20 and 20 mg/L**, which is ***much less than*** the state acute and chronic chloride criteria. However, this concentration is ***greater than*** what we would normally expect to measure in undisturbed New Hampshire surface waters.

We recommend that your monitoring group continue to conduct chloride sampling in the epilimnion at the deep spot, particularly in the spring during snow-melt and during rain events during the summer. This will establish a baseline of data that will assist your monitoring group and DES to determine lake quality trends in the future.

Please note that chloride analyses can be run free of charge at the DES Limnology Center. Please contact the VLAP Coordinator if you are interested in chloride monitoring.

DATA QUALITY ASSURANCE AND CONTROL

Annual Assessment Audit:
During the annual visit to your pond, the biologist conducted a sampling procedures assessment audit for your monitoring group. Specifically, the biologist observed the performance of your monitoring group while sampling and filled-out an assessment audit sheet to document the volunteer monitors' ability to follow the proper field sampling procedures, as outlined in the VLAP Monitor's Field Manual. This assessment is used to identify any aspects of sample collection in which volunteer monitors failed to follow proper procedures, and also provides an opportunity for the biologist to retrain the volunteer monitors as necessary. This will ultimately ensure that the samples volunteer monitors collect are truly representative of actual lake and tributary conditions.

Overall, your monitoring group did an ***excellent*** job collecting samples on the annual biologist visit this year! Specifically, the members of your monitoring group followed the proper field sampling procedures and there was no need for the biologist to provide additional training. Keep up the good work!

USEFUL RESOURCES

Best Management Practices to Control Nonpoint Source Pollution: A Guide for Citizens and Town Officials, DES Booklet WD-03-42, (603) 271-2975 or www.des.nh.gov/organization/commissioner/pip/publications/wd/documents/wd-03-42.pdf.

Impacts of Development Upon Stormwater Runoff, DES fact sheet WD-WQE-7, (603) 271-2975 or www.des.nh.gov/organization/commissioner/pip/factsheets/aot/documents/wqe-7.pdf.

Lake Protection Tips: Some Do's and Don'ts for Maintaining Healthy Lakes, DES fact sheet WD-BB-9, (603) 271-2975 or www.des.nh.gov/organization/commissioner/pip/factsheets/bb/documents/bb-9.pdf.

Proper Lawn Care In the Protected Shoreland, The Comprehensive Shoreland Protection Act, DES fact sheet WD-SP-2, (603) 271-2975 or www.des.nh.gov/organization/commissioner/pip/factsheets/sp/documents/sp-2.pdf.

Road Salt and Water Quality, DES fact sheet WD-WMB-4, (603) 271-2975 or www.des.nh.gov/organization/commissioner/pip/factsheets/wmb/documents/wmb-4.pdf.

Shorelands Under the Jurisdiction of the Comprehensive Shoreland Protection Act, DES fact sheet SP-4, (603) 271-2975 or www.des.nh.gov/organization/commissioner/pip/factsheets/sp/documents/sp-4.pdf.

Through the Looking Glass: A Field Guide to Aquatic Plants, North American Lake Management Society, 1988, (608) 233-2836 or www.nalms.org.

Watershed Districts and Ordinances, DES fact sheet WD-WMB-16, (603) 271-2975 or www.des.nh.gov/organization/commissioner/pip/factsheets/wmb/documents/wmb-16.pdf.